

Office of General Counsel
College of Southern Nevada
6375 W. Charleston Blvd., #WCE310
Las Vegas, NV 89146

DEBRA L. PIERUSCHKA
General Counsel
Nevada Bar No. 10185
TINA RUSSOM
Associate General Counsel
Nevada Bar No. 11702
COLLEGE OF SOUTHERN NEVADA
OFFICE OF GENERAL COUNSEL
6375 W. Charleston Blvd. (WCE310)
Las Vegas, Nevada 89146
Telephone: (702) 651-7325
Debra.pieruschka@csn.edu
Attorney for Defendant CSN

UNITED STATES DISTRICT COURT

CLARK COUNTY, NEVADA

KEVIN RAIFORD,

Plaintiff,

vs.

STATE OF NEVADA, ex rel BOARD OF
REGENTS OF THE NEVADA SYSTEM
OF HIGHER EDUCATION, on behalf of
the COLLEGE OF SOUTHERN NEVADA,
etc. et al.

Defendants.

Case No.: 2:24-cv-01501-JCM-BNW

**DEFENDANT STATE OF NEVADA, ex
rel BOARD OF REGENTS OF THE
NEVADA SYSTEM OF HIGHER
EDUCATION, on behalf of the
COLLEGE OF SOUTHERN NEVADA’S
MOTION TO EXTEND TIME TO
RESPOND TO THE COMPLAINT (First
Request)**

Complaint filed: August 15, 2024

Defendants, STATE OF NEVADA, *ex rel.* BOARD OF REGENTS OF THE NEVADA
SYSTEM OF HIGHER EDUCATION, on behalf of the COLLEGE OF SOUTHERN NEVADA
("CSN" and/or "Answering Party" and/or "Defendant") by and through its counsel, Debra L.
Pieruschka, General Counsel of CSN and Tina Russom, Associate General Counsel of CSN,
hereby requests an extension until October 4, 2024, to respond to Plaintiff's Complaint (ECF
No. 1) pursuant to LR IA 6-1.

Plaintiff filed his Complaint on August 15, 2024. On August 19, 2024, the Office of the
Attorney General was served. Upon information and belief, Chancellor of Defendant, STATE

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1 OF NEVADA, *ex rel* BOARD OF REGENTS OF THE NEVADA SYSTEM OF HIGHER
2 EDUCATION was served on or about August 22, 2024. Undersigned counsel was out of the
3 jurisdiction and unavailable by telephone or email from August 23, 2024, through September 4,
4 2024. Further, Assistant General Counsel for Defendant, the COLLEGE OF SOUTHERN
5 NEVADA, recently resigned from her position.

6 The deadline for Defendant to respond to the Complaint is currently on or about
7 September 12, 2024. Defendant's former counsel immediately contacted Plaintiff's counsel to
8 inquire as to whether Plaintiff would agree to the extension. (**Exhibit 1**). Plaintiff's counsel
9 agreed to an extension. (**Exhibit 1**). Defendant's counsel submitted Stipulation and Order to
10 Plaintiff's counsel. (**Exhibit 2**). As of the filing of this motion, Plaintiff has not returned the
11 proposed Stipulation and Order to file with this Court. (**Exhibit 2**).

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1 This is Defendants first request for an extension of time to respond to the Complaint and
2 is not intended to cause any delay or prejudice to any party, but rather to allow Defendants time
3 to investigate Plaintiff's claims. As set forth above, Defendants' counsel was only aware of the
4 service upon return to the office on September 4, 2024. Therefore, Defendant respectfully
5 requests until October 4, 2024, to file its responsive pleading.

6 DATED this 11th day of September 2024.

7
8 COLLEGE OF SOUTHERN NEVADA
9 OFFICE OF GENERAL COUNSEL

10 /s/ Debra L. Pieruschka

11 Debra L. Pieruschka, Esq.

12 General Counsel

13 Nevada Bar No. 10185

14 COLLEGE OF SOUTHERN NEVADA

15 OFFICE OF GENERAL COUNSEL

16 6375 W. Charleston Blvd. (WCE310)

17 Las Vegas, Nevada 89146

18 Telephone: (702) 651-7325

19 *Attorneys for Defendant CSN*

20 **IT IS SO ORDERED.**

21 Dated this 12 day of September 2024.

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23 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of September 2024, I caused a copy of the foregoing
**DEFENDANT STATE OF NEVADA, ex rel BOARD OF REGENTS OF THE NEVADA
SYSTEM OF HIGHER EDUCATION, on behalf of the COLLEGE OF SOUTHERN
NEVADA'S MOTION TO EXTEND TIME TO ANSWER COMPLAINT (First Request)**
to be served upon all parties appearing in this case by the following means:

- ☐ Odyssey File/Serve system upon the parties on the E-Service Master List
- ☒ CM/ECF system upon the parties on the E-Service Master List
- ☐ Hand-Delivery (including handing it to recipient or delivering it to the person's office or usual place of abode and leaving it with someone of suitable age and discretion who resides there)
- ☐ Delivery Service (e.g., FedEx, UPS)
- ☐ Other means (if the other party has consented in writing to service by such means)
- ☐ U.S. Mail, First Class, postage prepaid

MICHAEL ARATA, ESQ.
HKM Employment Attorneys, LLP
101 Convention Center Dr., Suite 600
Las Vegas, NV 89109
marata@hkm.com
Attorney for Plaintiff

/s/ Carrie Parker
An employee of the College of Southern Nevada

EXHIBIT “1”

EXHIBIT “1”

Re: [EXTERNAL] RE: re: Raiford v. CSN, United States District Court, Dist. of Nevada Case No. 2:24-cv-01501-JCM-BNW

Parker, Carrie <Carrie.Parker@CSN.EDU>

Mon 9/9/2024 4:30 PM

To: Arata, Mike <marata@hkm.com>

Cc: Pieruschka, Debra <Debra.Pieruschka@CSN.EDU>; 36f4c7597+matter1521591136@maildrop.clio.com <36f4c7597+matter1521591136@maildrop.clio.com>

 1 attachments (85 KB)

2024.09.09 CSN SAO re Extend Time to File Answer.doc;

Good afternoon Mr. Arata. Thank you for graciously granting an extension to our office. Attached hereto, please find the proposed SAO for your review, comment and/or approval. Should it be acceptable, please advise of your permission to affix your electronic signature. Appreciate your time in advance.

Carrie Parker
Legal Assistant, Office of General Counsel
carrie.parker@csn.edu
Main: 702-651-7488
Direct: 702-651-5454

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From: Arata, Mike <marata@hkm.com>

Sent: Monday, September 9, 2024 8:06 AM

To: Neff, Karissa <Karissa.Neff@CSN.EDU>

Cc: Pieruschka, Debra <Debra.Pieruschka@CSN.EDU>; Parker, Carrie <Carrie.Parker@CSN.EDU>; 36f4c7597+matter1521591136@maildrop.clio.com <36f4c7597+matter1521591136@maildrop.clio.com>

Subject: RE: [EXTERNAL] RE: re: Raiford v. CSN, United States District Court, Dist. of Nevada Case No. 2:24-cv-01501-JCM-BNW

[External Email]

Hi Karissa:

I heard from Mr. Raiford and he agrees to the extension request. Please send over a proposed stipulation.

Thanks,
Mike



Mike Arata
Attorney

101 Convention Center Drive, Suite 600
Las Vegas, NV 89109

702-674-9270
marata@hkm.com
www.hkm.com

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From: Neff, Karissa <Karissa.Neff@CSN.EDU>
Sent: Friday, September 6, 2024 11:48 AM
To: Arata, Mike <marata@hkm.com>
Cc: Pieruschka, Debra <Debra.Pieruschka@CSN.EDU>; Parker, Carrie <Carrie.Parker@CSN.EDU>;
36f4c7597+matter1521591136@maildrop.clio.com
Subject: RE: [EXTERNAL] RE: re: Raiford v. CSN, United States District Court, Dist. of Nevada Case No. 2:24-cv-01501-JCM-BNW

Hi Mike,

We are always open to discussing settlement and presenting any offers to CSN but at this time we do not have any settlement authority. After you discuss with your client, please let us know regarding the extension.

Thanks,

Karissa

From: Arata, Mike <marata@hkm.com>
Sent: Friday, September 6, 2024 10:56 AM
To: Neff, Karissa <Karissa.Neff@CSN.EDU>
Cc: Pieruschka, Debra <Debra.Pieruschka@CSN.EDU>; Parker, Carrie <Carrie.Parker@CSN.EDU>;
36f4c7597+matter1521591136@maildrop.clio.com
Subject: [EXTERNAL] RE: re: Raiford v. CSN, United States District Court, Dist. of Nevada Case No. 2:24-cv-01501-JCM-BNW

[External Email]

Hi Karissa:

I've reached out to Mr. Raiford concerning CSN's request and I will let you know once I hear from him.

Does CSN have any interest in attempting to explore possible resolution at this time?

Thanks,
Mike



Mike Arata
Attorney

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New York | Philadelphia | Phoenix | Pittsburgh | Portland | Riverside | San Diego | Seattle | Spokane | St. Louis | Washington, D.C.

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From: Neff, Karissa <Karissa.Neff@CSN.EDU>
Sent: Friday, September 6, 2024 9:49 AM
To: Arata, Mike <marata@hkm.com>
Cc: Pieruschka, Debra <Debra.Pieruschka@CSN.EDU>; Parker, Carrie <Carrie.Parker@CSN.EDU>
Subject: RE: re: Raiford v. CSN, United States District Court, Dist. of Nevada Case No. 2:24-cv-01501-JCM-BNW

Hi Mike,

I just left you a voicemail regarding the same and thought I'd follow up by email in case you are out of the office. Please let me know if you are willing to grant the extension below for CSN to file a response to Raiford's complaint.

Thank you,

Karissa D. Neff, Esq.
Assistant General Counsel
O: (702) 651-7325
Email: karissa.neff@csn.edu

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From: Neff, Karissa

Sent: Thursday, September 5, 2024 9:17 AM

To: Arata, Mike <marata@hkm.com>

Cc: Pieruschka, Debra <Debra.Pieruschka@CSN.EDU>; Parker, Carrie <Carrie.Parker@CSN.EDU>

Subject: re: Raiford v. CSN, United States District Court, Dist. of Nevada Case No. 2:24-cv-01501-JCM-BNW

Good morning,

CSN was served in the above-referenced case. CSN is in the process of obtaining outside counsel to defend it. Please advise if you are willing to grant CSN an extension up to, and including, October 4, 2024, to file a responsive pleading. CSN appreciates your anticipated professional courtesy.

Thanks,

Karissa D. Neff, Esq.

Assistant General Counsel

O: (702) 651-7325

Email: karissa.neff@csn.edu

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EXHIBIT “2”

EXHIBIT “2”

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debra.pieruschka@csn.edu
Attorney for Defendant CSN

UNITED STATES DISTRICT COURT

CLARK COUNTY, NEVADA

KEVIN RAIFORD,

Plaintiff,

vs.

STATE OF NEVADA, ex rel BOARD OF
REGENTS OF THE NEVADA SYSTEM
OF HIGHER EDUCATION, on behalf of
the COLLEGE OF SOUTHERN NEVADA,
etc. et al.

Defendants.

Case No.: 2:24-cv-01501-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT TO
FILE AN ANSWER OR RESPONSIVE
PLEADING**

Defendant, STATE OF NEVADA, *ex rel.* BOARD OF REGENTS OF THE NEVADA
SYSTEM OF HIGHER EDUCATION, on behalf of the COLLEGE OF SOUTHERN NEVADA
("CSN" and/or "Answering Party" and/or "Defendant") by and through its counsel, Debra L.
Pieruschka, General Counsel of CSN and Tina Russom, Associate General Counsel of CSN, and
hereby stipulate and agree that the deadline for Defendant to file its Answer or other responsive
pleading shall be extended up to and through **October 4, 2024**, to allow counsel time to discuss
the merits of the case, possible resolution and retainment of outside counsel.

1 This request is made jointly by counsel in good faith and not for purposes of delay. This
2 is the first request.

3 Respectfully submitted this 9th day of September, 2024.

4
5 HKM EMPLOYMENT ATTORNEYS

THE COLLEGE OF SOUTHERN NEVADA

6
7
8 MICHAEL A. ARATA
9 HKM Employment Attorneys, LLP
10 101 Convention Center Dr., Suite 600
11 Las Vegas, NV 89109
12 (702) 674-9270 (Phone)
13 marata@hkm.com

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(702) 651-7325 (Phone)
(702) 651-7464 (Fax)
debra.pieruschka@csn.edu

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15 IT IS SO ORDERED.

16 Dated this ____ day of September, 2024.

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19 UNITED STATES MAGISTRATE JUDGE
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